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9 *Attorneys for Defendant*

10 **IN THE DISTRICT COURT**
11 **FOR THE NORTHERN MARIANA ISLANDS**

12 **MARI CHUNG CEPEDA, individually and) Case No. 1:21-CV-00018__**
13 **as personal representative of Tae Hyang)**
14 **Bang, deceased,)**

15 **Plaintiff,**

16 **vs.**

17 **JEJU AIR CO., LTD.,**

18 **Defendant.**

19 **STIPULATED MOTION TO EXTEND**
20 **TIME UNDER LOCAL RULE 7.1(f)**

21 **Judge: Manglona, C.J.**

22 **COME NOW** Plaintiff and Defendant, by and through counsel, and hereby stipulate
23 and agree as follows:

- 24 1. On June 11, 2021, the above-captioned matter was removed to this Court.
- 25 2. Under Fed. R. Civ. P. 81(c)(2), Defendant's answer or other permissible
26 response is due June 18, 2021 (seven days after the notice of removal was filed).
- 27 3. Under Fed. R. Civ. P. 6(b), the Court may for good cause extend the time before
28 the original time expires.
4. This is the first request for an extension of time. LR 7.1(f)(3)(A).
5. The Court has not previously set any deadlines in this matter. LR 7.1(f)(3)C).
6. The parties stipulate to a 30-day extension, to July 16, 2021, for Defendant to
respond to the complaint, in anticipation that Defendant will file a motion to
dismiss some or all of the counts in the complaint.

- 1 7. Furthermore, the stipulated extension will accommodate Plaintiff's counsel, Mr.
- 2 William Fitzgerald, who will be off island for medical reasons from June 26, to
- 3 August 6, 2021.
- 4 8. Defendant agrees to extend the time for Plaintiff's opposition to Defendant's
- 5 anticipated motion to dismiss to August 27, 2021.
- 6 9. The parties further stipulate that Defendant's reply will be due September 10,
- 7 2021.
- 8 10. The parties further stipulate that the anticipated motion to dismiss shall be heard
- 9 at any date and time thereafter convenient to the Court.
- 10
- 11

12 Respectfully submitted this 16th day of June, 2021.

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15 LAW OFFICES OF WILLIAM FITZGERALD
 Attorney for Plaintiff Mari Chung Cepeda

16
17 By: _____/s/
 William Fitzgerald

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20 BANES HOREY BERMAN & MILLER, LLC
 Attorneys for Defendant Jeju Air Co., Ltd.

21
22 By: _____/s/
 David G. Banes

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25 *time.RCM-210616doc.doc*